

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Modification of Mail Classification	:	
Schedule Regarding Forever	:	Docket No. MC2012-10
Print-on-Demand Indicia	:	

COMMENTS OF THE GREETING CARD ASSOCIATION

The Greeting Card Association (GCA) files these comments pursuant to Commission Order No. 1295 (March 23, 2012). The Postal Service proposes to change the definition of Forever Stamps to include print-on-demand (POD) indicia, which would be sold through its Automated Postal Centers (APCs) in lieu of adhesive stamps.

GCA believes that the Postal Service's initiative would be a valuable improvement in the Forever Stamp program, and that the Commission should approve it.

Two features of the proposed new POD indicia would provide the citizen mailer with useful options. Because the APCs will sell a "customer-specified quantity of postage indicia"¹, the mailer need purchase no more than his or her immediate requirements. The plan to offer a choice of indicia designs also makes the proposal more attractive to consumers. GCA believes that by increasing the customer's options the proposal would make use of the mail more appealing, relative to electronic substitutes, and would thereby help to preserve high-contribution First-Class letter mail volume.

¹ Notice of the United States Postal Service of Classification Change Related to Forever Print-on-Demand Indicia (Notice), March 22, 2012, p. 1.

The proposed change seems clearly consistent with 39 U.S.C. § 3642. Since it involves the sale of a new form of postage indicia for an existing market-dominant product, through Postal Service-owned channels, no effect on private markets, including small businesses, should result (§ 3642(b)(3)(A) and (C)).

Accordingly, GCA respectfully urges the Commission to approve the proposal as fully consistent with 39 U.S.C. § 3642.

March 30, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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